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Anti-Corruption Policy


JAS Asset Public Company Limited is committed to conducting its business with honesty and integrity in accordance with the principles of good corporate governance and social responsibility, extending to all groups of stakeholders. In 2022, the Company formally declared its intention to join the Thai Private Sector Collective Action Coalition Against Corruption (CAC) as a demonstration of its zero-tolerance stance against all forms of corruption and its strong commitment to operating with true transparency.

The Company has therefore established an “Anti-Corruption Policy” that covers all activities which may create opportunities for individuals or groups to exploit the Company through fraudulent acts, including embezzlement, concealment or misrepresentation of information, and bribery involving monetary or non-monetary assets of value. This policy serves as a practical guideline and tool for employees at all levels to adopt and adhere to in their daily operations, particularly when considering the approval of any transactions. The aim is to ensure that all processes are carried out with honesty, transparency, and fairness, thereby preventing adverse impacts on the Company’s credibility as perceived by society, as well as on its stakeholders. Furthermore, the policy outlines operational practices, including systematic procedures for receiving and managing complaints.

Accordingly, the Company hereby announces that this “Anti-Corruption Policy” shall be enforced and applicable to the Board of Directors, executives, and employees at all levels, including subsidiaries, affiliates, business representatives, and partners, all of whom are required to acknowledge and comply with this policy.

Scope of the Anti-Corruption Policy

The Anti-Corruption Policy applies to all operations, whether conducted directly or indirectly, in collaboration with JAS Asset Public Company Limited, including its subsidiaries and affiliates, business representatives, and business partners. The policy is applicable to the Board of Directors, executives, and employees at all levels, serving as a strict guideline for collective compliance. All parties are expected to perform their duties with honesty and integrity, in accordance with the principles of good corporate governance and ethical conduct.

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Definitions


Corruption Refers to any act that violates the Company’s regulations or constitutes a legal offense for the purpose of seeking personal gain or benefits for a specific group of individuals. Such acts include those that prevent proper verification of documents or operational processes in alignment with established rules and actual practices. They also include acts of bribery in exchange for assets, monetary value, or non-transparent commitments; unauthorized or unilateral actions without proper approval; as well as offering anything in return for neglecting an employee’s official duties. This definition further extends to the abuse of authority for intimidation or solicitation of benefits outside the Company’s established regulations, and the embezzlement of funds or assets by transferring them into personal ownership or for the benefit of a specific group without proper authorization in accordance with Company policies.

Gift Refers to the giving of money or items of value to the Company’s stakeholders as a gesture of goodwill on traditional or culturally significant occasions, without involving the giving or receiving of gifts as a means of non-transparent business exchange or bribery. Such acts must not be carried out arbitrarily and require proper authorization.

Cultural Norm Refers to social activities that are not officially recognized as public holidays in either the Thai or international calendar, but are customary business practices observed on auspicious occasions to express congratulations or appreciation. Participation in such activities is optional and not mandatory.

Hospitality Refers to the hosting of a third party or group of third parties, which does not constitute internal hospitality between supervisors and employees of the Company, through the provision of food and beverages, accommodation, and lawful entertainment activities. Such hospitality is offered solely for business purposes and/or other business-related occasions.

Sponsorship Refers to the mutual promotion of business activities to support and assist in the marketing and publicity of products among the Company’s stakeholders, as well as support for educational institutions upon formal request. This is intended to enable educational institutions to help promote the Company in educational activities. Both providing and receiving support may take the form of monetary contributions, consumer goods, or various types of technology products. Such support is primarily business-related and not intended for public benefit; therefore, acknowledgment certificates (*e.g., tax-deductible or donation certificates*) cannot be issued in any case.

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Donations Refers to the provision of valuable assets, including consumables and financial contributions, to foundations, charitable organizations, educational institutions, and public benefit projects, without expecting any monetary or material return from the donation. This giving is intended solely to support social activities and has no business-related purpose. The Company may receive an acknowledgment certificate (*if available*) for such donations.

Political Contributions Refers to actions undertaken to support political parties, government bodies, political alliances, or politically affiliated groups, including assistance through assets, financial contributions, or political publicity. Any involvement by the Company in political support may negatively affect its credibility in the eyes of society. Such political support is separate from employees' voting rights, which they are entitled to exercise freely in accordance with democratic principles.

Conflict of Interest Refers to performing duties with self-interest as the primary consideration, using personal judgment in operations or decisions contrary to the Company's established rules, seeking benefits in activities where one is not entitled, or interfering in operations outside one's responsibility. To avoid conflicts of interest, all employees at every level must perform their duties in accordance with Company regulations, adhere to the authority and approval processes established by the Company, and prioritize the Company's collective interests over personal or group-specific gains.

Facilitation Payment Refers to an act of corruption that constitutes bribery, involving the provision of money or valuable assets to any individual or legal entity, whether in the public or private sector, for the purpose of circumventing or expediting processes that are regulated by established procedures.

Revolving Door Refers to the employment of former government officials who have been separated from their public service positions for at least two years, to hold positions within the Company, including as advisors, senior executives, or employees at any level. Recruitment must follow standard selection procedures, and such employees shall receive benefits equal to those of other Company employees, without any additional privileges. They must not use their status as former government officials as a means to facilitate contact with government agencies or to obtain shortcuts in conducting government-related operations.

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Anti-Corruption Guidelines

1) Giving or Receiving Gifts and Hospitality

The Company does not support the giving or receiving of any type of gifts, whether in the form of monetary value, consumable goods, gift baskets, technology products, or special privileges for food, beverages, or entertainment activities. This is to ensure that all executives and employees adhere to principles of honesty, transparency, and integrity, without seeking improper personal benefits that could lead to corruption or bribery, whether directly or indirectly, which may affect the Company's credibility and impact all groups of stakeholders.

Best Practices for Receiving Gifts


1. Employees or any department are strictly prohibited from soliciting gifts or, even indirectly, using the Company's name to exchange for non-transparent or unfair benefits.
2. In cases where it is not possible to refuse a gift, the Company or its representatives should first ensure through communication that the gift is offered without any hidden intent to induce the Company or its representatives to exchange it for something, or to create any non-transparent commitments that could establish business obligations constituting corruption—whether the exchange is for current or future benefits.
3. The Company or its representatives should consider the reasonableness between the value of the gift and the occasion (estimated as appropriate). The gift must not be illegal or contrary to societal ethics. If the gift's value is deemed excessive relative to the occasion, it may be refused without violating the Company's policy.
4. If the Company or its representatives determine that accepting the gift would result in more harm than benefit, the gift may be refused without violating the Company's policy.
5. After receiving any gifts, whether assets or cash, the Company's representatives must immediately—or within 1–3 business days—record the gift in the **Company Asset Recording Process**. Under no circumstances may the gift be transferred or kept as personal property without approval from the authorized personnel of the Company.
6. Once a gift is recorded in the Company Asset process, the Asset Registration Department shall assess whether the gift can be used internally by the Company. If it is not relevant, the gift should be disposed of in one of two ways: donation or sale.
 - 6.1. In the Case of Donations : The Asset Registration Department shall record the details in the “Request and Receipt of Donation” form, which includes the following information:
 - 6.1.1. Name of the event, project, foundation, or charitable organization

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- 6.1.2. Date and time of the donation
- 6.1.3. Location of the donation
- 6.1.4. Name and contact number of the coordinator or the receiving organization
- 6.1.5. Purpose of the donation
- 6.1.6. Quantity of items or monetary value being donated
- 6.1.7. Signatures of the requester, reviewer, and approver, in that order
- 6.2. In the Case of Disposal/Sale: The Asset Registration Department shall record the details in the “Asset Disposal/Sale” form, which includes the following information:
 - 6.2.1. Name of the asset
 - 6.2.2. Brand, model, and identifying characteristics
 - 6.2.3. Asset type/category
 - 6.2.4. Quantity
 - 6.2.5. Appraised value prior to disposal/sale
 - 6.2.6. Signatures of the requester, reviewer, and approver, in that order
 - 6.2.7. Signature of the individual or legal entity purchasing the asset
 - 6.2.8. Once the asset is sold—whether partially or entirely—the responsible staff shall collect all payment documents and submit them to the Accounting/Finance Department immediately, or no later than the next business day, for the issuance of receipts and accounting entries
 - 6.2.9. The Accounting/Finance Department shall compile the Asset Disposal/Sale form, payment receipts, and related documents into the accounting document retention process for future auditing and verification purposes

Best Practices: Giving Gifts

1. Before giving gifts to any business partners or stakeholders of the Company, the Company or its representatives must first verify whether the recipient has explicitly declared a commitment to the “No Gift Policy.” If so, the Company or its representatives must respect and strictly adhere to that policy.
2. Occasions on which the Company may consider giving gifts are as follows:
 - 2.1. Traditional celebratory occasions, including International New Year, Thai New Year, and Christmas
 - 2.2. Customary congratulatory occasions, such as celebrating the opening of a new business, new branch, new project, or business achievement
3. The Company or its representatives may give gifts to business partners or stakeholders up to a maximum of 30 times per year.

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4. Gifts must have a clear purpose and correspond to the occasions specified in item 2. The Company's representatives must obtain approval from the authorized personnel before proceeding, based on the following four considerations:
 - 4.1. Whether the gift falls within the annual gift-giving quota
 - 4.2. Whether the recipient is within the scope of the Company's stakeholders
 - 4.3. Whether the value of the gift is within the approved limit for gift-giving
 - 4.4. Whether the occasion for giving is appropriate relative to the value of the gift

Good Practices: Hospitality

1. Hosting of the Company's stakeholders (excluding employees) may be conducted under the following purposes:
 - 1.1. Hospitality for business communication purposes
 - 1.2. Hospitality for AGM or EGM meetings / agenda-based meetings and press conferences
2. The Company or its representatives may provide hospitality through the provision of food and beverages, accommodation, and lawful entertainment activities within the approved annual budget. Such activities should be conducted with caution, especially when organizing entertainment events. The budget per event should not be excessively high, even if within the approved budget, and the necessity for the activity must be properly justified.
3. In cases where hospitality involves accommodation and entertainment activities, the requesting party must prepare an Internal Memo and submit it to the authorized personnel of the Company for approval in every instance, considering the following three components:
 - 3.1. Whether the approval request aligns with the intended purpose of the type of hospitality
 - 3.2. Appropriateness of accommodation arrangements and/or an overall review of the event's arrangements
 - 3.3. Whether the requested budget is within the approved limit for the type of hospitality
4. Upon completion of the hospitality, the requesting party must submit all supporting documents, both originals and/or copies, to the relevant department within 3–5 business days.

2) Giving and Receiving Support (Sponsorship)

The Company may provide and receive support from its stakeholders, including financial contributions, consumer goods, and technology products. Such support must be conducted in a manner that benefits the

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public interest, with transparency and in accordance with the Company's defined objectives. It must be free from any intent to gain improper personal or group-specific benefits, and must not constitute actions that lead to corruption, bribery, or induce the neglect of any duties.

Best Practices: Receiving Support

1. The purposes for which the Company may receive support from its stakeholders are as follows:
 - 1.1. Receiving support to promote activities organized by the Company for its employees
 - 1.2. Receiving support for advertising or promoting products, or for product testing, from the Company's stakeholders
2. Employees of the Company are strictly prohibited from soliciting support in an arbitrary manner, without a clear purpose, or from sources that cannot be verified.
3. The Company or its representatives may refuse to accept support if it is deemed inappropriate, such as when the support is given for bribery, in exchange for non-transparent benefits, or outside the Company's intended objectives.
4. Prior to accepting any support, the Company or its representatives must carefully verify the individual or legal entity providing the support to ensure they have no history of involvement in illegal activities, corruption, or penalties imposed by regulatory authorities—whether under review or finalized—to avoid negative impacts on the Company and its stakeholders.
5. Once support is received, whether in the form of valuable assets or financial contributions, the Company's representatives must record the assets and contributions in the Company's asset recording process within 1–3 business days.
6. The Company will not issue a donation receipt (Certificate of Appreciation) to the supporter, as the support is not a charitable contribution to an organization, fund, or foundation.

Best Practices: Giving Support

1. The Company or its representatives may provide support to the Company's stakeholders for the following purposes:
 - 1.1. To support activities organized by the Company's stakeholders, including activities for student groups, in the form of financial contributions or valuable assets of any type, as requested in a formal letter.
2. Support in the form of financial contributions must be within the Company's approved authorization limits, and support in the form of assets must not be illegal or contrary to good moral standards.

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3. Prior to providing support, the Company's representatives must prepare an **Internal Memo**, attaching details of the promotional activities or verifiable information confirming the existence of the project. This memo must be submitted to the Company's authorized personnel for approval, whether the Company initiates the support itself or receives a formal request for support.
4. Upon completion of the support, the requesting party must collect all related documents and submit them to the relevant department for record-keeping under the "Annual Support Record."

3) Receiving and Providing Donations for Charity


Donations may be made to support activities for the public benefit, without expecting any financial or business-related return, and to foster goodwill among the Company's stakeholders, society, and local communities. Donations may be provided in the form of cash or valuable assets of any type and must be conducted solely in the name of the Company.

The categories in which the Company may provide and receive charitable donations are as follows:

- **Education:** Donations for the construction of libraries, scholarships, educational equipment, and related purposes.
- **Sports:** Donations for the repair of sports fields, sports uniforms, equipment, and related purposes.
- **Public Health:** Donations for the purchase of medical equipment and related purposes.
- **Social Welfare:** Donations for repairing bus stops near the Company's premises, improving public restrooms, providing consumer goods to assist disaster-affected individuals, and related purposes.

Good Practices: Receiving Donations

1. The Company may receive charitable donations for the following purposes:
 - 1.1. The Company may act as an intermediary or host in collecting donations, and any cash or valuable assets received must be used solely for the donation categories specified by the Company.
2. The Company shall not accept donations derived from fraudulent or illegal activities, nor from individuals or legal entities involved in corruption or any unlawful conduct.
3. Upon receiving donations, the responsible Company representative must fully record the details in the "Charitable Donations – Receipt and Giving Form" as specified in the form. All donated cash and assets must be delivered to the relevant project in full, and under no circumstances may any portion be retained as personal property.

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Good Practices: Providing Donations


1. Donations may only be made after obtaining approval from the Company’s authorized approver and must comply with the approved donation budget framework set by the Company.
2. Making Donations: The Company’s representative must request prior approval from the authorized approver and record the details clearly in the “Charitable Donations – Receipt and Giving Form” as follows:
 - 2.1. Name of the event, project, foundation, or charitable organization
 - 2.2. Location of the donation
 - 2.3. Name and contact number of the coordinator or department receiving the donation
 - 2.4. Scheduled start and end dates of the donation
 - 2.5. Purpose of the donation
 - 2.6. Quantity of items or cash value donated
 - 2.7. Signatures of the requesting officer, reviewer, and approver in order
3. In cases where it is necessary to purchase or manufacture items for donation, the requesting officer must proceed with the Company’s procurement process according to Company regulations after obtaining approval via the “Charitable Donations – Receipt and Giving Form.”
4. Upon completion, the Company’s representative responsible for the donation must compile all supporting documents, including tax invoices and donation certificates (if any), and submit them to the relevant department within 3–5 business days.

4) Political Contributions

The Company has a policy of not providing any form of political contributions, including promoting or advertising any political party, or offering financial or in-kind support for political purposes. The Company emphasizes operating in accordance with democratic principles and political neutrality. In addition, the Company encourages all employees to act as responsible citizens and to exercise their democratic rights equally in accordance with the law.

Good Practices: Political Contributions

1. The Company prohibits any political campaigning, posting of political advertisements, or solicitation in any form, whether online or offline, throughout all Company premises.

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2. All employees are prohibited from using their position or affiliation with the Company to provide any form of political support, in order to avoid reputational damage, conflicts of interest, or public misunderstanding regarding the Company and its stakeholders.
3. All employees, at every level, are free to exercise their political rights in accordance with democratic principles and applicable laws. However, employees should avoid expressing extreme political views in the workplace or during working hours, or openly demonstrating political affiliations, and should not attempt to persuade colleagues to participate in any political activities, in order to prevent conflicts of interest and preserve the freedom of all employees.
4. Department heads are prohibited from using their authority to coerce or influence employees to participate in political activities.

5) Conflict of Interest

The Company is committed to conducting its business with honesty, transparency, equality, and fairness toward all stakeholders, while prioritizing the interests of the Company. However, such conduct must not give rise to conflicts of interest that could result in unfairness. Directors, executives, and employees of the Company are required to carefully review and monitor any transactions or matters that may potentially lead to conflicts of interest, in accordance with good corporate governance principles.

Good Practices: Conflict of Interest

1. The Company is required to disclose accurate and complete details of its operations to the public in accordance with the disclosure requirements of the Securities and Exchange Commission (SEC) and the Stock Exchange of Thailand (SET), without any distortion of information.
2. All employees of the Company must perform their duties to the fullest extent of their responsibilities and must not interfere with operations outside their designated scope of responsibility.
3. In considering approvals for any action, the authorized personnel must strictly comply with the Company's rules and regulations, without using their position to pursue personal gains inappropriately, which could result in conflicts of interest affecting the Company or any group of stakeholders.
4. All employees must not seek personal benefits from using the Company's information in any manner that creates direct or indirect competition with the Company. Furthermore, employees are prohibited from disclosing confidential operational information of any department to unauthorized parties, which could negatively affect operational procedures.

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6) Facilitation Payment

The Company has no policy to make facilitation payments to any government agency or private sector organization in order to obtain expedited or shortcut procedures in operations, projects, or any business-related processes. This also includes making adjustments to rectify wrongful actions or exchanging such actions for unfair business benefits.

Good Practices: Facilitation Payment


1. The Company has a strict no-facilitation payment policy under all circumstances, regardless of the amount of benefit or convenience offered to the Company, or even if the actions are carried out by a third party on behalf of the Company.
2. Directors, executives, and employees must not create opportunities for anyone seeking to solicit facilitation payments in any form, nor ignore situations that could lead to such acts.
3. All interactions and transactions with government or private sector agencies must be conducted in a straightforward and transparent manner, without offering or accepting any facilitation payments.

7) Revolving Door

The Company does not have a policy of hiring current government officials who are still in office, except for employees who have been out of government service for at least two years. Such individuals may be appointed to positions as directors, executives, employees, or advisors of the Company, provided that they go through the same recruitment and selection process as non-government employees, on an equal and fair basis.

Good Practices: Revolving Door

1. Only individuals who have been out of government service for at least two years are free to apply for any position within the Company.
2. When recruiting former government employees, the Human Resources department must conduct thorough background checks to avoid any negative impact on the Company.
3. The Company shall not exploit former government employees to gain undue benefits. Furthermore, such employees, once appointed to the Company, are prohibited from disclosing Company information to government agencies or using their previous connections to facilitate any business transactions with the government on behalf of the Company.

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Guidelines for Disclosure and Communication of the Anti-Corruption Policy


1. The company requires the Training Department to incorporate anti-corruption knowledge into the onboarding curriculum for all new employees, ensuring that every new employee is aware of and strictly adheres to these practices.
2. The company organizes anti-corruption training conducted by experts with specialized knowledge to reinforce awareness and instill a strong sense of responsibility among employees at all levels at appropriate intervals.
3. The company discloses the Anti-Corruption Policy on its official website, allowing the general public, customers, business partners, investors, shareholders, and employees to easily access and study the information.
4. The company includes the Anti-Corruption Policy in the annual information disclosure report (56-1 One Report) available on the company's website, enabling the general public, customers, business partners, investors, shareholders, and employees to easily access and study the information.
5. The company displays anti-corruption knowledge boards in visible areas within the workplace to promote values and cultivate an awareness among employees to avoid involvement in any form of corrupt activities.
6. The company communicates the Anti-Corruption Policy to employees via email each time the content is updated or reviewed.

Whistleblowing and Complaint Handling

The company has established channels for whistleblowing and complaint reporting for employees or stakeholders who observe or become aware of acts of corruption or actions that may constitute corruption. These channels provide a safe and confidential means for whistleblowers, with the Investigation Committee directly responsible for handling and investigating the reported incidents.

Scope and Conditions for Whistleblowing and Complaint Reporting

1. A whistleblower or complainant identifies a wrongdoing or a situation that may constitute an act of corruption or violate the rules and procedures outlined in the company's Anti-Corruption Policy. The report must include information at a level that can be linked to factual evidence or supported by proof that can be further investigated.

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2. A whistleblower or complainant must not report based solely on personal feelings, without careful consideration according to principles and reasoning, in order to ensure that the reporting process is effective and credible.
3. A whistleblower or complainant is someone who has been treated unjustly, directly or indirectly affected by acts of corruption, or threatened or coerced to participate in wrongdoing with any individual or group associated with the company.

Eligible Parties for Whistleblowing and Complaints


1. Primary Stakeholders: This includes all levels of company employees, employees' family members, shareholders, investors, customers, creditors, and communities located near the company's premises.
2. Secondary Stakeholders: This includes the general public, business competitors, and prospective customers or employees.

Whistleblowing and Complaint Reporting Channels

1. Email : ir@jasasset.co.th
2. Website : <https://www.jasasset.co.th/th/investor-relations/corporate-governance/whistleblowing>
3. Postal Mail : To be submitted to the Audit Committee at No. 187, 189, Jay Mart Building, Ramkhamhaeng Road, Rat Phatthana Subdistrict, Saphan Sung District, Bangkok 10240, or to JAS Asset Public Company Limited at No. 87, The Jas Ramintra Building, Room No. A315, 13th Floor, Lat Pla Khao Road, Anusawari Subdistrict, Bang Khen District, Bangkok 10220.


Protection and Care for Whistleblowers and Complainants

1. To protect the rights of whistleblowers and complainants, the Company shall keep their personal information strictly confidential, with primary consideration given to their safety.
2. The Company shall carefully review the circumstances and carry out the fact-finding process with due caution regarding sensitive matters, in order to avoid negative consequences that may adversely affect whistleblowers. The Company will ensure fairness to both whistleblowers and respondents without discrimination.
3. In the event that whistleblowers or complainants suffer damages from incidents of fraud and corruption, the Company shall provide appropriate and fair remedies to mitigate such damages.

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Procedures for Handling Complaints

1. The Audit Committee must regularly compile whistleblowing reports and complaints from all available channels to prevent delays in the handling process.
2. The Audit Committee shall categorize the subjects or types of whistleblowing reports and complaints into the form file titled **“Annual Whistleblowing and Complaint Report.”**
3. The Audit Committee shall contact the whistleblower or complainant to confirm and verify the reported details, if contact is possible, as some whistleblowers or complainants may choose to remain anonymous or may not wish to be contacted.
4. Review all attached documents or supporting evidence (if any) to assess their adequacy for consideration.
5. If the documents or supporting evidence are insufficient, the Audit Committee shall conduct site visits in cases where necessary or gather additional witnesses to obtain the most complete and comprehensive information.
6. The Audit Committee shall contact the supervisor of the accused individual or the concerned department to inform them of the reported incident.
7. The Audit Committee shall contact the accused individual or department to provide the opportunity to explain the facts, ensuring fairness to both parties.
8. The Audit Committee shall review the details to analyze the actions and determine appropriate disciplinary measures within **14 business days**.
 - 8.1. In cases where the review concludes that no wrongdoing has occurred, or the matter results from a misunderstanding:
 - 8.1.1. The Audit Committee shall record the investigation results in the **“Annual Whistleblowing and Complaint Report”** form with the status marked as **“No Misconduct.”**
 - 8.1.2. The Audit Committee shall contact the whistleblower or complainant to inform them of the review results, if contact is possible.
 - 8.1.3. The Audit Committee shall prepare a summary report of the outcome and submit it to the relevant parties for acknowledgment.
 - 8.2. In cases where wrongdoing is confirmed
 - 8.2.1. The Audit Committee shall record the investigation results in the **“Annual Whistleblowing and Complaint Report”** form, marking the status as **“Confirmed Misconduct”** or **“Partial Misconduct”** for the purpose of annual complaint statistics. The record shall include the

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disciplinary measures imposed and a clear explanation of the rationale behind the decision, supported by proper documentation.

8.2.2. The Audit Committee shall prepare a document titled **“Record of Disciplinary Action.”**

8.2.3. The Audit Committee shall submit the matter to the Chief Executive Officer for acknowledgment.

8.2.4. The Audit Committee shall communicate the details of the review results to the supervisor of the offender and to the offender themselves.

8.2.5. The Audit Committee shall forward the **“Record of Disciplinary Action”** document for signatures in the following sequence:

8.2.5.1. The Audit Committee signs to certify the confirmed misconduct.

8.2.5.2. The offender’s supervisor signs to acknowledge the confirmed misconduct.

8.2.5.3. The offender signs to acknowledge the confirmed misconduct.

8.2.5.4. If the offender does not accept the review outcome, they may submit an appeal to the Audit Committee to reconsider the decision.

8.2.6. The Audit Committee shall contact the whistleblower or complainant to notify them of the review results, if contact is possible.

8.2.7. The Audit Committee shall prepare a summary report of the outcome and submit it to the relevant parties for acknowledgment.

8.2.8. In cases where the misconduct involves deficiencies in work processes at any stage, the Audit Committee must inform the relevant departments to improve the processes for greater efficiency.


Scope of Disciplinary Actions for Fraud and Corruption

The Audit Committee shall determine the scope of disciplinary actions in each case based on the severity of the impact on the Company in the following three areas:

1. **Reputational Impact** the effect on the Company’s credibility and public trust.
2. **Financial Impact** the loss of Company assets and monetary value.
3. **Operational Impact** the effect on the Company’s internal work processes

Types of Disciplinary Actions for Fraud and Corruption

1. Suspension from duty for a specified period.
2. Payment of compensation equivalent to the agreed value of damages between the Company and the offender.

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3. Termination of employment with the Company, with no eligibility for re-employment in any subsidiary or affiliated company.
4. Legal proceedings to the fullest extent of the law.

Disciplinary Actions for Non-Compliance with the Anti-Corruption Policy

1. If any individual within the scope of this policy intentionally neglects compliance, resulting in negative impacts on the Company, the Company has the right to impose disciplinary actions immediately in accordance with the types of sanctions for fraud and corruption.
2. Individuals within the scope of this policy cannot claim “lack of awareness of the policy” as a justification for engaging in fraudulent or corrupt actions, as the Company communicates the policy to employees through multiple channels.
3. If an employee commits a violation and their supervisor neglects to address it or fails to take corrective action in accordance with the policy, the supervisor may be subject to disciplinary measures, up to and including termination of employment.
4. If any business representative or partner of the Company intentionally disregards or violates this policy, the Company reserves the right to terminate the contract or cease business transactions with the party involved.

Schedule for Reviewing and Updating the Anti-Corruption Policy

The department responsible for managing the Anti-Fraud and Anti-Corruption Policy is required to review and update the details of each process on a regular annual basis to ensure they remain current and aligned with the situation. The updated policy shall then be submitted for approval to the Company’s Board of Directors.

The policy shall be effective from October 20,2023 onwards.



The approver of the Anti-Corruption Policy

Mr. Suphot Sirikulapas

Chief Executive Officer

